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Attorney for Daniel Woolem

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIEL WOOLEM,

Defendant.

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No. 1:16-CR-02079-SAB-1

**DECLARATION OF
RICARDO HERNANDEZ**

RICARDO HERNANDEZ, being first duly sworn upon oath, deposes
and states as follows:

1. The government has filed a motion to dismiss count 5 of the indictment in this case.
2. The defendant currently has a pending motion for a short continuance of the trial date based on the unavailability of a witness who is a co-defendant & who was allegedly directly involved with the alleged acts in count 5.
3. Despite the motion to dismiss count 5, defense counsel still would like the opportunity to interview the missing witness if possible.
4. In addition, defense counsel has a jury trial scheduled in Benton County Superior Court on August 21, 2017 in State v. Huevo case number 17-1-00142-6.

DECLARATION OF RICARDO HERNANDEZ

5. The Benton County matter involves multiple counts of Class A Felonies & the defendant in that case has been in custody since February 2017.

6. The pending Benton County matter that is set for trial on the same date as this matter is the other reason that defense counsel seeks a brief continuance of the trial date in this case.

7. The government despite moving to dismiss count 5 still does not object to a short continuance & has suggested Sept 11 as a possible trial date. The defendant & defense counsel have no objection to Sept 11 as a new trial date.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED this 8th day of August 2017.

s/ Ricardo Hernandez
Ricardo Hernandez

I hereby certify that on August 8, 2017 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Tomas Hanlon, Assistant United States Attorney

s/ Ricardo Hernandez
Ricardo Hernandez